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Attorneys for Plaintiff
Johnny Doe, a minor and through his Guardian, Jane Doe, on
behalf of himself and all others similarly situated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOHNNY DOE, a minor, by and through his
Guardian, JANE DOE, on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

EPIC GAMES, INC., a North Carolina
corporation,

Defendant.

Case No. 4:19cv3629

**DECLARATION OF JANE DOE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
LEAVE TO PROCEED UNDER
PSEUDONYMS**

CLASS ACTION

1 I, Jane Doe, hereby declare as follows

2 1. I make this Declaration upon personal knowledge and in support of Plaintiff's Motion to
3 Proceed under Pseudonyms ("Motion"). I am Plaintiff Johnny Doe's legal guardian and parent. I am over
4 twenty-one years of age and not under any legal disability. If called and sworn as a witness, I would
5 testify competently and truthfully as to the facts in this Declaration.

6 2. Plaintiff Johnny Doe is addicted to playing Fortnite. He was induced to make several in-
7 App purchases within Fortnite that were non-refundable. Facts and extent of Johnny's in-App purchases
8 are not known to anyone other than his attorneys and close family members. He will needlessly suffer
9 social stigmatization with increased embarrassment, humiliation and emotional distress should the media,
10 his friends, neighbors or others learn of his identity.

11 3. Johnny is my only son, is a minor and is 12 years old. Revealing my identity will
12 necessarily blow the cover of identity of Johnny. I am prepared to provide a statement of my true identity
13 and my son's identity for the Court's in camera review, upon the Court's request.

14 4. Disclosing our identities will lead to psychological distress and physical symptoms thereof,
15 as well as have a negative impact on our personal and social lives. I fear discrimination and retaliation that
16 may interfere with his life at school, neighborhood and community and ruin his ability to progress in his
17 career and personal life, obtain future employment, and provide for his family.

18 5. We respectfully request that this Court permit us to pursue our claims under pseudonyms to
19 protect our privacy in this litigation.

20 I declare under penalty of perjury under the laws of the United States that the foregoing is true and
21 correct. Executed this 21th day of June, 2019 in California.

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24 Jane Doe
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